

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA,)
) No. 08 CR 888
 v.) Hon. James. B. Zagel
)
ROD BLAGOJEVICH, et al.)

GOVERNMENT’S MOTION FOR DEFENDANT TO SECURE BOND

The United States, by and through PATRICK J. FITZGERALD, United States Attorney for the Northern District of Illinois, respectfully submits the following motion requesting a date of July 15, 2011, for the defendant to secure his bond, stating as follows:

1. On June 27, 2011, defendant Rod Blagojevich was convicted of seventeen counts of a second superseding indictment charging wire fraud, extortion, and solicitations of bribes. After the return of the verdict, the Court modified certain conditions of the defendant's bond, including requiring the defendant to secure his bond by posting his personal residence as well as a second residential property owned by the defendant.

2. On June 28, 2011, the government provided defense counsel a list of four items that the government needed in order to expeditiously prepare the paperwork necessary to post the two properties. These items include: (a) a

current title report; (b) a current appraisal; (c) a mortgage statement; and (d) an insurance certificate.

3. On June 30, 2011, after inquiry from the government, defense counsel informed the government that they were working to get the paperwork together.

4. On July 5, 2011, after inquiry from the government, defense counsel informed the government that it was continuing to work on the necessary paperwork and would have an update for the government in several days.

5. On July 11, 2011, and July 12, 2011, the defense provided several documents related to the defendant's personal residence. To date, the government has not received any documents related to the second residential property at issue.

6. Instead of continuing to wait for paperwork, it is the government's position that the defendant and any additional necessary parties (*e.g.* those individuals also on the title to the properties) should appear before the Court on July 15, 2011, and enter forfeiture agreements related to the two properties necessary to secure the defendant's bond.

WHEREFORE, the government requests that on July 15, 2011, the defendant and all other necessary parties appear before the Court, sign the paperwork to secure the defendant's bond, and be admonished by the Court

regarding the consequences of violations of the defendant's conditions of release.

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned Assistant United States Attorney hereby certifies that the following documents:

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were served on July 12, 2011, in accordance with FED. R. CRIM. P. 49, FED. R. CIV. P. 5, LR 5.5, and the General Order on Electronic Case Filing (ECF) pursuant to the district court's system as to ECF filers.

s/Reid Schar _____
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